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April 15, 2004

Marlene Dortch, Secretary  
Federal Communications Commission  
445 Twelfth Street, SW  
Washington, DC 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: South Canaan Cellular Communications Company, LP  
CC Docket No. 94-102  
E911 Phase II Interim Implementation Report

Dear Ms Dortch:

Pursuant to the Commission's Order to Stay,<sup>1</sup> South Canaan Cellular Communications Company, LP ("South Canaan") hereby submits its E911 Phase II Interim Implementation Report to assist the Commission in monitoring the company's progress in deploying Phase II E911 technology.

South Canaan reiterates its request for waiver of Section 20.18(d) of the Commission's Rules (filed August 1, 2003). As indicated by the additional information provided herein, the public interest will be served by grant of the requested relief.

Please contact the undersigned if you have any questions regarding this report.

Respectfully submitted,

  
Sylvia Lesse

Counsel for South Canaan  
Cellular Communications Company, LP

Enclosure

cc: John Muleta, Chief, Wireless Telecommunications Bureau  
David Solomon, Chief, Enforcement Bureau  
D'wana Terry, Chief, Public Safety & Critical Infrastructure Division  
Eugenie Barton, Public Safety & Critical Infrastructure Division  
Qualex International  
Mr. Bernie Swartwood, Pike County Communications

<sup>1</sup> See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

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**SOUTH CANAAN CELLULAR COMMUNICATIONS COMPANY, LP.  
E911 PHASE II INTERIM IMPLEMENTATION REPORT  
FOR TIER III CARRIERS  
First Quarter, 2004**

South Canaan Cellular Communications Company, L.P. ("South Canaan" or "Company"), pursuant to the Commission's Order to Stay,<sup>1</sup> hereby provides an interim report to assist the Commission in monitoring South Canaan's progress in deploying Phase II E911 technology.<sup>2</sup>

**I. The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid):**

South Canaan's status with respect to Phase I and Phase II requests from PSAPs remains unchanged. South Canaan has received a valid Phase I request from Pike County and provides Phase I service to this county. South Canaan has also received a valid Phase II request from Pike County. The company has not received a Phase I or a Phase II request from the other county it serves, Wayne County.

**II. The carrier's specific technology choice:**

The Company continues to report that a network-based Phase II solution is not economically or technically feasible and that it has no alternative but to convert its analog system to a CDMA network that supports a handset-based solution.

**III. Status on ordering and/or installing necessary network equipment:**

As previously reported, the Company has purchased and installed upgrades to its Lucent switch so that it will now support digital signals.<sup>3</sup> The Company reports that it has completed the digital conversion of its first cell site, has updated the ALI database, and currently is awaiting testing of this cell site with the PSAP. The Company continues to remain on schedule to overlay its existing analog service with CDMA service by the end of 2004.

In anticipation of completion of the conversion of its network to CDMA, South Canaan has initiated the development of a subscriber educational campaign to encourage analog customers to transition to CDMA ALI-capable phones. Through these efforts, the Company

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<sup>1</sup> See *In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems; E911 Compliance Deadlines for Non-Nationwide Tier III CMRS Carriers: Order to Stay*, CC Docket No. 94-102 at para. 30 (rel. Oct. 10, 2003) ("Order to Stay").

<sup>2</sup> On August 1, 2003, South Canaan requested a limited and temporary waiver of the Commission's Phase II obligations ("Petition") and filed an E911 Phase II Interim Report for Tier III Carriers ("First Report"). In its Petition, South Canaan committed to providing quarterly progress reports. On November 10, 2003, South Canaan supplemented the Petition with updated information to further substantiate its request. See Supplement to Petition for Waiver of Section 20.18 of the Commission's Rules, CC Docket No. 94-102, filed Nov. 10, 2003 ("Supplement"). Accordingly, this instant report serves as the Company's third quarterly progress report.

<sup>3</sup> See Supplement at 2.

anticipates that most of its customers will have migrated to CDMA ALI-capable phones by the end of 2007. South Canaan hereby provides further details regarding this campaign:

1. Continuation of on-going efforts to transition customers from analog to digital.  
As previously reported, South Canaan has initiated sales of the Motorola 120E trimode phone, a phone that works on South Canaan's analog system and will provide Phase II location information on South Canaan's CDMA network once it becomes fully operational. An additional ALI-capable phone is now also available to South Canaan subscribers – a Motorola V60. The penetration rate of the two ALI-capable phones (both new customers and upgrades for existing customers) now stands at approximately 9%, up from the 7% level reported in January, 2004.<sup>4</sup>
2. Marketing Campaign  
After the CDMA system has been fully deployed in the beginning of 2005, the Company plans to initiate an aggressive marketing campaign targeting remaining analog customers with billing inserts and print advertising. The marketing efforts would emphasize that location information will not be available to emergency service providers unless the customers transition to CDMA ALI-capable phones. Customers that still have analog-only handsets will also be specifically targeted regarding the additional benefits of digital service.
3. Incentives to Convert to CDMA ALI-Capable Phones  
Consideration is also being given to providing a rebate or other benefit to customers who turn in their analog or TDMA handset and purchase a CDMA phone. The Company plans to limit sales of analog phones to the general public once the CDMA network is fully deployed and tested. Analog phones will continue to be available in limited quantities for a limited period of time for those subscribers who require a 3-watt phone to obtain a signal.

#### **IV. Information Regarding Availability of ALI-Capable Handsets**

As reported above, South Canaan has added an additional ALI-capable handset to its stock. South Canaan anticipates that it incorporate additional ALI-capable models into its inventory as it approaches the time when it will begin to actively market its CDMA system.

#### **V. The estimated date on which Phase II service will first be available in the carrier's network:**

South Canaan continues to report that the anticipated date that it will begin selling and activating ALI-capable CDMA is January 1, 2005. Prior to the January 1, 2005 benchmark, South Canaan will have installed the necessary hardware and software in its CDMA network to provide Phase II service from its handset-based solution.

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<sup>4</sup> Although these dual-mode ALI-capable phones are being marketed, South Canaan continues to maintain that the public interest is better served by awaiting full system deployment before aggressively marketing CDMA ALI-capable handsets to subscribers. See Petition at 7 ("requiring sales of CDMA handsets before full system testing and deployment would result in customer dissatisfaction, as well as confusion as to when and where digital service is available").

**DECLARATION OF CAROLYN C. COPP**

I, Carolyn C. Copp, President of South Canaan Cellular Communications Company, L.P., do hereby declare under penalty of perjury that I have read the foregoing "E911 Phase II Interim Implementation Report for Tier III carriers, First Quarter, 2004" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

14 April 2004  
Date

Carolyn C. Copp  
Carolyn C. Copp